



FEDERAL ELECTION COMMISSION
Washington, DC 20002

August 28, 2018

Charles R. Spies, Esq.
Clark Hill PLC
1001 Pennsylvania Ave., NW
Suite 1300 South
Washington, DC 20004

RE: MUR 7122
Right to Rise USA

Dear Mr. Spies:

On August 15, 2016, the Federal Election Commission notified you of a complaint in the above-captioned matter alleging that Right to Rise USA and you, in your official capacity as treasurer (collectively "Right to Rise"), may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"), in connection with a \$1,000,000 contribution that American Pacific International Capital, Inc. ("APIC") made to Right to Rise on March 26, 2015, and a \$300,000 contribution APIC made to Right to Rise on June 29, 2015. On August 30, 2016, the Commission received the response you filed on behalf of Right to Rise. Subsequently, the Commission obtained additional information that may indicate that by soliciting and knowingly accepting contributions from APIC, Right to Rise may have violated 52 U.S.C. § 30121(a)(2).

Before considering whether to find reason to believe Right to Rise violated 52 U.S.C. § 30121(a)(2), the Commission has asked us to provide you with additional information obtained by the Commission in this matter so that Right to Rise may, if it chooses, supplement its response. This additional information is listed below:

- Neil Bush, the brother of Jeb Bush, a candidate supported by Right to Rise, solicited contributions for Right to Rise during 2015.
- Right to Rise may have authorized Neil Bush to act as its agent to solicit contributions on its behalf. For example, in February 2015, Right to Rise provided Neil Bush with a memorandum regarding the prohibition on foreign national contributions and how it applied to domestic subsidiaries of foreign corporations, which Neil Bush then provided to Wilson Chen and Huaidan Chen a/k/a Celine Tang a/k/a Serena Tang ("Serena Tang").
- Neil Bush knew that his fellow APIC board members Gordon Tang and his wife Serena Tang, lived in China and were Chinese nationals.
- During the weekend of February 6, 2015, Neil Bush met with Gordon Tang in China and discussed the possibility of APIC making a contribution to Right to Rise.

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- Later in February 2015, Neil Bush contacted APIC Executive Director Wilson Chen and Serena Tang to solicit a contribution from APIC. In soliciting Wilson Chen and Serena Tang, Neil Bush explicitly referenced his prior conversation with Gordon Tang about a possible APIC contribution to Right to Rise.
- Neil Bush provided Wilson Chen and Serena Tang with a memorandum from Right to Rise regarding the prohibition on foreign national contributions and its application to domestic subsidiaries of foreign corporations.
- Serena Tang, at Gordon Tang's direction, instructed APIC Executive Director Wilson Chen to follow-up on Neil Bush's solicitation of APIC and Neil Bush was included in Serena Tang's communication with Wilson Chen.
- On March 18, 2015, Wilson Chen contacted you, as Right to Rise's treasurer/legal counsel, and expressed interest in contributing to Right to Rise on behalf of APIC, and Neil Bush was sent this communication. On March 24, 2015, Right to Rise sent a contribution form to Wilson Chen.
- In April 2015, following APIC's first contribution, you, as Right to Rise's treasurer/legal counsel, contacted Wilson Chen regarding his citizenship status. Shortly thereafter, Wilson Chen informed you that he was a U.S. citizen.

Should Right to Rise wish to supplement its original response to address this additional information, we would appreciate such a submission by September 12, 2018. If you have any questions, please contact Christopher L. Edwards, the attorney handling this matter, at (202) 694-1568.

Sincerely,

Lisa J. Stevenson
Acting General Counsel

Kathleen M. Guith

BY: Kathleen M. Guith
Associate General Counsel for Enforcement